

Slade R. Metcalf (SM 8360)  
Katherine M. Bolger (KB 6206)  
Rachel F. Strom (RS 9666)  
Hogan & Hartson LLP  
875 Third Avenue  
New York, NY 10022  
Telephone: (212) 918-3000  
*Attorneys for Defendants Monica Levinson,  
Twentieth Century Fox Film Corporation,  
One America Productions, Inc., Todd Schulman,  
Sacha Baron Cohen, Larry Charles, Jay Roach  
Everyman Pictures, Springland Films,  
Dune Entertainment, LLC, Comedy Partners,  
Dakota North Entertainment, Inc., and  
Four by Two Production Company*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
Kathie Martin,

Plaintiff,

– against –

Dan Mazer, Anthony Hines, Larry Charles,  
Peter Baynham, Monica Levinson, Jay  
Roach, Todd Phillips, Everyman Pictures,  
Twentieth Century Fox Film Corporation,  
One America Productions, Inc., Gold/Miller  
Productions, Springland Films, Dune  
Entertainment, LLC, MTV Networks d/b/a  
Comedy Central, Dakota North  
Entertainment, Inc., Four by Two  
Production Company, Sacha Baron Cohen,  
Todd Schulman, and John Does Nos. 1-5,

Defendants.  
-----X

Case No. 08 CV 1828 (LAP)

**DECLARATION OF JOAN HANSEN IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS THE FIRST AMENDED COMPLAINT**

I, **JOAN HANSEN**, declare as follows:

1. I am an Assistant Secretary of defendant One America Productions, Inc. (“One America”), and submit this declaration on behalf of defendants Monica Levinson (“Levinson”), Twentieth Century Fox Film Corporation (“Fox”), One America, Todd Schulman (“Schulman”), Sacha Baron Cohen (“Cohen”), Larry Charles (“Charles”), Jay Roach (“Roach”), Everyman Pictures (“Everyman”), Springland Films (“Springland”), Dune Entertainment LLC (“Dune”), Comedy Partners (incorrectly sued herein as “MTV Networks d/b/a Comedy Central”), Dakota North Entertainment, Inc. (“Dakota”) and Four by Two Production Company (“Four by Two”) (collectively, “Defendants”) in support of their Motion to Dismiss the First Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. On December 22, 2006, Plaintiff filed a complaint against Defendants in the Circuit Court of Jefferson County in Alabama. On February 4, 2008, the Circuit Court of Jefferson County dismissed that action without prejudice (the “Order”). (A true and correct copy of the Order is annexed hereto as Exhibit “A”).

3. Plaintiff’s First Amended Complaint, which was filed on April 11, 2008, stems from Plaintiff’s alleged inducement to appear in the film *Borat – Cultural Learnings of America for Make Benefit Glorious Nation of Kazakhstan* (the “Film”) and her subsequent appearance in the Film.

4. As shown on the DVD of the Film (a true and correct copy of which is annexed hereto as Exhibit “B”), the Film tells the fictional story of Borat Sagdiyev (“Borat”), a Kazakh TV personality, who is dispatched to the United States to report on the American people.

5. In the Film, Plaintiff is depicted in one scene attempting to teach Borat how to “dine like gentleman” for a dinner party he has planned with “high society” in Alabama (the “Sequence”). (A true and correct copy of the Sequence is annexed hereto as Exhibit “C”).

6. Defendant Fox distributed the Film, which was first released in theaters in the United States on or about November 3, 2006, and was released on DVD in the United States on March 6, 2007.

7. Defendant One America produced the Film.

8. Defendant Springland is a registered d/b/a of One America.

9. Defendant Everyman is the “loan-out” corporation for defendant Jay Roach, who is one of the producers of the Film.

10. Defendant Levinson is an executive producer of the Film.

11. Defendant Schulman was employed by One America as a field coordinator for the Film.

12. Defendant Charles is the director of the Film.

13. Defendant Cohen is an actor who plays the character Borat in the Film and is a producer and writer of the Film. Defendant Four by Two is a company name Cohen used to take his production credit in the Film, but it was not in any way involved in the production or distribution of the Film or the DVD release of the Film.

14. Defendant Dune was a passive investor in the Film.

15. Defendants Comedy Partners and Dakota were not in any way involved in the production or distribution of the Film or the DVD release of the Film. The only possible connection that these entities have to the Film involves a television program produced by Dakota, which aired on Comedy Central, that included a behind the scenes view of the Film.

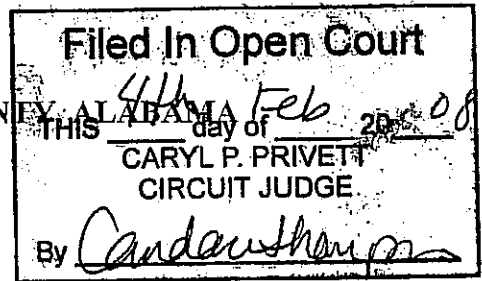
I declare under the penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct and that this Declaration was executed in Los Angeles, California on May 2, 2008.

  
JOAN HANSEN

**EXHIBIT A**

**To the Declaration of Joan Hansen  
in Support of Defendants' Motion To Dismiss the First Amended Complaint**

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA



KATHIE MARTIN,

Plaintiff,

vs.

SACHA BARON COHEN, et al.,

Defendants.

CIVIL ACTION NUMBER  
CV 06-7333-CPP

J. BANKS SEWELL  
REC'D 2/8/08  
FILE NO. TH003-1

ORDER

cc: GMB /TWM /WHB

Pursuant to the Writ of Mandamus issued by Alabama Supreme Court, this Court's Order of April 26, 2007 is hereby VACATED.

The Defendant's Motions to Dismiss are hereby GRANTED. This action is hereby DISMISSED without prejudice. Costs taxed to the Plaintiff.

DONE and ORDERED this 4th day of February, 2007.

A handwritten signature of Caryl P. Privett.

CARYL P. PRIVETT  
CIRCUIT JUDGE

**EXHIBIT B**

**To the Declaration of Joan Hansen  
in Support of Defendants' Motion To Dismiss the First Amended Complaint**

**(A true and correct copy of the Film on DVD  
submitted in hard copy in Chambers)**

**[Not Filed Electronically]**

**EXHIBIT C**

**To the Declaration of Joan Hansen  
in Support of Defendants' Motion To Dismiss the First Amended Complaint**

**(A true and correct copy of the Film Sequence on DVD  
submitted in hard copy in Chambers)**

**[Not Filed Electronically]**